

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

-----X

UNITED STATES OF AMERICA, :

Plaintiff,

-against-

**NOTICE OF RULE G /
RULE 12(b)(6) MOTION TO
DISMISS**

REAL PROPERTY AND PREMISES KNOWN AS
432 NORTH OAKHURST DRIVE,
CONDOMINIUM UNIT 103, BEVERLY HILLS,
CALIFORNIA 90210, AND ALL PROCEEDS
TRACEABLE THERETO;

Civil Action No. 22-CV-7410

REAL PROPERTY AND PREMISES KNOWN AS
432 NORTH OAKHURST DRIVE,
CONDOMINIUM UNIT 203, BEVERLY HILLS,
CALIFORNIA 90210, AND ALL PROCEEDS
TRACEABLE THERETO;

ANY AND ALL FUNDS ON DEPOSIT IN STIFEL
NICOLAUS & CO. ACCOUNT NUMBER ENDING
IN 9142, HELD IN THE NAME OF 7D BUSINESS
BUREAU INC., AND ALL PROCEEDS
TRACEABLE THERETO; and

ANY AND ALL FUNDS ON DEPOSIT IN
CITIZENS BUSINESS BANK ACCOUNT
NUMBER ENDING IN 7135, HELD IN THE
NAME OF 7D BUSINESS BUREAU INC., AND
ALL PROCEEDS TRACABLE THERETO,

Defendants *In Rem*

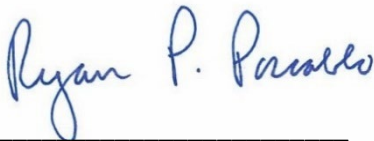
-----X

PLEASE TAKE NOTE THAT, upon the accompanying Memorandum of Law, the Declarations of Steven R. Welk and Yuliya Luy, the exhibits annexed thereto, any reply papers served hereafter, and all pleadings and proceedings had herein, Claimants 73DT Business Enterprises, LLC and 7D Business Bureau, Inc. (together “Claimants”), by and through its counsel, STEPTOE & JOHNSON LLP, shall move

this Court, before the Honorable Dora L. Irizarry, at the U.S. Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, for an order dismissing all claims and allegations in the complaint, pursuant to Rule G of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, Rule 12(b)(6) of the Federal Rules of Civil Procedure, and Title 18, United States Code Section 983, on the ground that plaintiff United States of America has failed to state sufficient facts to support a reasonable belief that the government will be able to meet its burden of proof at trial, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
March 14, 2023

STEPTOE & JOHNSON LLP

By: _____

Ryan P. Poscablo
1114 Avenue of the Americas
New York, NY 10036
Tel: (212) 506-3900
Email: rposcablo@steptoe.com
Attorneys for Claimants